

Review Updates (The Non-Controversial Issues)

New Development:

Non-Responsive due to agreement

OnSite Disposal Systems (OSDS) Inspections:

Non-Responsive due to agreement

Non-Responsive due to agreement

Response to General Comments:

- Topics of General Comments included:
 - Overall support/lack of support for proposed decision

- Suitability of voluntary approaches to meet CZARA requirements
 - NOAA/EPA holding EPA to a higher standard
 - CZARA requires state to address issues outside of its control
 - State should have more time to develop CNP
 - CNP needs to address climate change
 - Effectiveness of Oregon's monitoring, tracking, and enforcement efforts
 - Questions NOAA/EPA's authority for establishing additional MMs
 - Suitability of state's process for identifying CCAs and additional MMs.
- Status: Summary of comments drafted; responses to 14 summary comments drafted (3 more to go although a few responses may need to be tweaked based on final decisions for other management measures)

Responding to Public Comments on Other Aspects of Oregon's Coastal Nonpoint Program that We Did Not Solicit Comments (such as on the Effectiveness of Oregon's General Monitoring and Tracking Efforts)

- Recommended Action: Acknowledge comments received. State that we did not solicit comments on these aspects of Oregon's program and are only considering comments related to new development, OSDs, additional management measures for forestry, agriculture, and general comments regarding CZARA at this time. There will be another opportunity for the public to comment on these specific aspects of Oregon's program when NOAA and EPA propose to approve Oregon's program.
- Reason for This Response:
 - Avoids responding substantively to comments that may indicate a decision the federal agencies have made about elements of Oregon's program until we are assured we have received all comments and information on these MMs.
 - Avoids providing a substantive response that may conflict the decision and statements made in the rationale we will draft once we propose approval of these MMs.
- Next Steps:
 - Develop standard response that undergoes technical, policy, managerial and legal review.

Review Updates (The Non-Controversial Issues)

New Development:

Non-Responsive due to agreement

OnSite Disposal Systems (OSDS) Inspections:

Non-Responsive due to agreement

Non-Responsive due to agreement

Response to General Comments:

- Topics of General Comments included:
 - Overall support/lack of support for proposed decision

- Suitability of voluntary approaches to meet CZARA requirements
- NOAA/EPA holding EPA to a higher standard
- CZARA requires state to address issues outside of its control
- State should have more time to develop CNP
- CNP needs to address climate change
- Effectiveness of Oregon's monitoring, tracking, and enforcement efforts
- Questions NOAA/EPA's authority for establishing additional MMs
- Suitability of state's process for identifying CCAs and additional MMs.
- Status: Summary of comments drafted; responses to 14 summary comments drafted (3 more to go although a few responses may need to be tweaked based on final decisions for other management measures)

Responding to Public Comments on Other Aspects of Oregon's Coastal Nonpoint Program that We Did Not Solicit Comments (such as on the Effectiveness of Oregon's General Monitoring and Tracking Efforts)

- Recommended Action: Acknowledge comments received. State that we did not solicit comments on these aspects of Oregon's program and are only considering comments related to new development, OSDs, additional management measures for forestry, agriculture, and general comments regarding CZARA at this time. There will be another opportunity for the public to comment on these specific aspects of Oregon's program when NOAA and EPA propose to approve Oregon's program.
- Reason for This Response:
 - Avoids responding substantively to comments that may indicate a decision the federal agencies have made about elements of Oregon's program until we are assured we have received all comments and information on these MMs.
 - Avoids a providing a substantive response that may conflict the decision and statements made in the rationale we will draft once we propose approval of these MMs.
- Next Steps:
 - Develop standard response that undergoes technical, policy, managerial and legal review.

Forestry Landslides:

- ~~Recommended Decision: Disapprove~~
- ~~Concern Raised in Proposed Decision: State does not have programs in place to protect high-risk landslide areas to ensure water quality standards and designated uses are achieved.~~
- ~~Reason for Recommended Action:~~
- ~~Revisions to Proposed Rationale: Citing additional science to show that harvesting and road construction on high-risk landslide areas does increase risk of landslides and impact water quality.~~
- ~~Concerns raised during public comment period:~~

Formatted: No bullets or numbering

- Status: Rationale drafted but still working to improve science discussion; summary comments drafted; response to comments not started.

Response to General Comments:

- Status: Response to comments drafted; responses to 14 comments drafted (3 more to go although a few responses may need to be tweaked based on final decisions for other management measures)

Comment [CJ1]: Should we include “Types or examples of general comments” as a section?

Formatted: No bullets or numbering

Responding to Public Comments Other Aspects of Oregon’s Coastal Nonpoint Program that We Did Solicit Comments (such as on the Effectiveness of Oregon’s General Monitoring and Tracking Efforts)

- Recommended Action: Acknowledge comments received. State that we did not solicit comments on these aspects of Oregon’s program and are only considering comments related to new development, OSDS, additional management measures for forestry, agriculture, and general comments regarding CZARA at this time. There will be another opportunity for the public to comment on these specific aspects of Oregon’s program when NOAA and EPA propose to approve Oregon’s program.

Formatted: No bullets or numbering

- Reason for This Response:

- Avoids responding substantively to comments that may indicate a decision the federal agencies have made a decision about elements of Oregon’s program until we are assured we have received all comments and information on these MMs.

Formatted: Space After: 10 pt, No bullets or numbering

- Avoids providing a substantive response that may conflict the decision and statements made in the rationale we will draft once we propose approval of these MMs.

- Next Steps:

- Develop standard response that undergoes technical, policy, managerial and legal review.

Formatted: Indent: Left: 0", Space After: 10 pt

Formatted: Space After: 10 pt, No bullets or numbering